

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

**Victoria Matthews,
Administrator Of The Estate Of
Cody Bohanan,**

Plaintiff,

v.

Butler County, *et al.*

Defendants.

Case No. 1:22-cv-00380

Judge Michael R. Barrett

Magistrate Judge Stephanie K. Bowman

PARTIES' JOINT MOTION TO EXTEND DISCOVERY SCHEDULE

The Parties, through counsel, respectfully request a sixty-day extension of remaining deadlines stated in the Court's December 6, 2022 Order (Doc. 11).

The Parties have been working together to complete discovery. At this time, paper discovery is nearly complete. The Parties have scheduled the depositions of Plaintiff and family members of Cody Bohanan, multiple Defendant Officers, and other witnesses in June 2023. The Parties are working together to set the depositions of remaining witnesses in the coming weeks. However, due to counsel's schedules and witnesses' availability, the Parties have determined that they will be unable to complete all depositions prior to the current discovery deadline of July 10, 2023.

The Parties now respectfully and jointly request an extension of deadlines to permit completion of discovery. The Parties believe a sixty-day extension is sufficient to accomplish this task. The Parties respectfully request an extension of dates as follows:

	Current Deadline	Proposed New Deadline
Fact Discovery	July 10, 2023	September 10, 2023
Plaintiff Expert Disclosures/Reports	July 31, 2023	September 30, 2023
Defense Expert Disclosures/Reports	September 15, 2023	November 15, 2023
Rebuttal Expert Disclosures/Reports	October 16, 2023	December 16, 2023
Expert Discovery	December 15, 2023	February 15, 2024
Dispositive Motion Deadline	January 31, 2024	March 31, 2024

This request is made in good faith and for good cause, will not unfairly prejudice any party, and has not been made for the purpose of undue delay or harassment.

Respectfully submitted,

/s/ Jacqueline Greene

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Certificate of Service

I hereby certify that on June 29, 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Jacqueline Greene

Jacqueline Greene

One of the Attorneys for Plaintiff